

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

CHAD MOREHEAD

PLAINTIFF

V.

CASE NO: 19-18

ERIKA L. NIXON, INDIVIDUALLY AND
AS AN EMPLOYEE AND AGENT OF
GREYHOUND LINES,
INCORPORATED; GREYHOUND
LINES, INCORPORATED; AND JOHN
DOES #1-10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI
COUNTY OF HINDS

TO: Erika L. Nixon
2840 Robinson Street, Apt. 149
Jackson, Mississippi 39209

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint with Discovery Attached to Rocky Wilkins, attorney for the Plaintiff, Morgan and Morgan, PLLC, 4450 Old Canton Road, Suite 200, Jackson, Mississippi 39211. Your response must be mailed or delivered within (30) days from the date of delivery of this summons and complaint with discovery attached or a judgment by default will be entered against you for the money or other things demanded in the complaint.

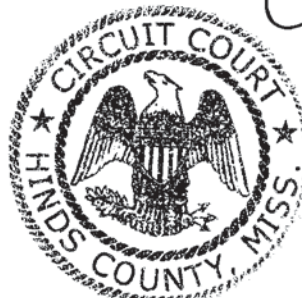
You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

WITNESS MY SIGNATURE and seal of office this the 7 day of January, 2019.

Zack Wallace, Circuit Clerk of
Hinds County, Mississippi

BY: Karlo Bailey, D.C.

Summons issued at the request of:
ROCKY WILKINS, ESQ., MSB # 99707
WILL GRAVES, ESQ., MSB#105679
MORGAN AND MORGAN, PLLC
4450 OLD CANTON ROAD, SUITE 200
JACKSON, MISSISSIPPI 39211
TELEPHONE: (601) 949-3388
FACSIMILE: (601) 949-3399
Attorneys for the Plaintiffs



PROOF OF SERVICE-SUMMONS

Erika L. Nixon
2840 Robinson Street, Apt. 149
Jackson, Mississippi 39209

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below:

FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE. By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender. (*Attach completed acknowledgment of receipt pursuant to M.R.C.P. Form 1B*).

PERSONAL SERVICE. I personally delivered copies to _____
on the _____ day of _____, 20_____, where I found said person(s) in _____
County of the State of _____.

RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within _____ County, of the State of _____.
I served the summons and complaint with discovery attached on the _____ day of _____, 20_____, at the usual place of abode of said person by leaving a true copy of the summons and complaint with discovery attached with _____, who is the (Here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint with discovery attached, and thereafter on the _____ day of _____, 20_____, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (*Attach signed return receipt or the return envelope marked "Refused"*).

At the time of service I was at least 18 years of age and not a party to this action.
Fee for service: \$ _____.

Process server must list below: [*Please print or type*]

Name _____
Social Security Number _____
Address _____
Telephone Number _____
STATE OF MISSISSIPPI
COUNTY OF _____

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named _____ who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Process Server (Signature)

Sworn to and subscribed before me this the _____ day of _____, 20_____.

NOTARY PUBLIC

(SEAL) My Commission expires: _____

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DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI
COUNTY OF HINDS

TO: **Greyhound Lines, Incorporated**
Attn: CT Corporation System
645 Lakeland East Drive, Suite 101
Flowood, Mississippi 39232

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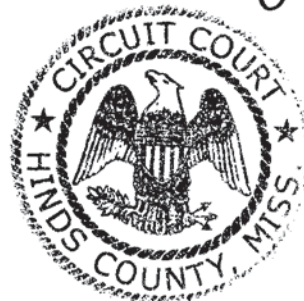
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TELEPHONE: (601) 949-3388
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Attorneys for the Plaintiffs



PROOF OF SERVICE-SUMMONS
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Attn: CT Corporation System
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Flowood, Mississippi 39232

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Process server must list below: [*Please print or type*]

Name _____
Social Security Number _____
Address _____

Telephone Number _____
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COUNTY OF _____

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Process Server (Signature)

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DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI
COUNTY OF HINDS

TO: **Greyhound Lines, Incorporated**
Attn: President
15110 N. Dallas Parkway
Dallas, Texas 75248

NOTICE TO DEFENDANT

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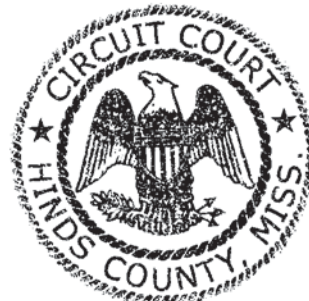
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TELEPHONE: (601) 949-3388
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Attorneys for the Plaintiffs



PROOF OF SERVICE-SUMMONS
Greyhound Lines, Incorporated
Attn: President
15110 N. Dallas Parkway
Dallas, Texas 75248

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Social Security Number _____
Address _____
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AND AS AN EMPLOYEE AND
AGENT OF GREYHOUND LINES,
INCORPORATED; GREYHOUND
LINES, INCORPORATED; AND
JOHN DOES #1-10**

DEFENDANTS

**COMPLAINT WITH DISCOVERY ATTACHED
JURY TRIAL REQUESTED**

COMES NOW, Plaintiff Chad Morehead, by and through undersigned counsel and files this Complaint with Discovery attached and would show unto this Honorable Court the following, to wit:

PARTIES

1.

Chad Morehead is an adult resident of Atlanta, Georgia.

2.

Erika L. Nixon is an adult resident of Jackson, Hinds County, Mississippi and may be served with process at 2840 Robinson Street, Apt. 149, Jackson, Hinds County, Mississippi 39209. At all times relevant hereto, Defendant Nixon managed, operated, supervised, maintained, trained, was responsible for, and obtained financial benefit from the Greyhound bus (hereinafter "subject vehicle") while doing business in Mississippi. Defendant Nixon is being sued individually and as the employee and/or agent of Defendant Greyhound Lines,

Incorporated. Defendant Nixon was in the course and scope of her employment with the Defendant at all times relevant hereto, including the time of the subject collision.

3.

Greyhound Lines, Incorporated (hereinafter "Greyhound") is a Texas corporation doing business in Mississippi. Greyhound may be served with process through its registered agent, CT Corporation System at 645 Lakeland East Drive Suite 101, Flowood, Mississippi 39232. In the alternative, Greyhound may be served with process by serving its President at its principle place of business located at 15110 N. Dallas Parkway, Dallas, Texas 75248. At all times relevant hereto, Greyhound owned, managed, leased, operated, supervised, maintained, trained, was responsible for, and obtained financial benefit from the subject vehicle doing business in Mississippi. At all relevant times hereto, Erika L. Nixon was acting in the course and scope of her employment for Greyhound. Greyhound hired, trained, managed, supervised, entrusted, and employed Defendant Nixon. Thus, Greyhound is liable for the acts and/or omissions of Erika L. Nixon under the theory of *respondeat superior* and is liable for the injuries of Plaintiff.

4.

Defendants, John Does #1-10, include those persons or entities unknown to the Plaintiff at this time that were involved in the control, ownership, management, leasing, operation, supervision, maintenance, training, inspection, repair, were responsible for, and obtained financial benefit from the Defendants and the subject vehicle's operation in Mississippi and for the persons or entities involved and/or designed and manufactured the subject vehicle and/or provided Defendant Erika L. Nixon with alcohol. Upon information and belief, John Does #1-10 are resident and nonresident Defendants doing business in the State of Mississippi whose identities are unknown at this time. The filing of this Complaint is a filing against all John Doe

Defendants and this Complaint will be appropriately amended in accordance with the Mississippi Rules of Civil Procedure when the identities are ascertained.

JURISDICTION AND VENUE

4.

This Court has jurisdiction over this matter pursuant to the Mississippi Constitution and the laws of the State of Mississippi. Venue is proper in the First Judicial District of Hinds County, Mississippi, as the acts complained of occurred in whole or in part in Hinds County, Mississippi, and one or more of the Defendants resides in the First Judicial District of Hinds County, Mississippi.

NEGLIGENCE

5.

On or about January 2, 2019 Plaintiff Chad Morehead was a fare paying passenger on a Greyhound bus operated by Defendant Erika L. Nixon on the Pascagoula Street entry ramp to Interstate 55 in Jackson, Hinds County, Mississippi. The Greyhound bus intended to go southbound. Suddenly and without warning, the Greyhound bus overturned and crashed.

6.

The aforesaid crash sued on herein was the fault of, and proximately caused by the negligence of defendants, Erika L. Nixon and Greyhound, in the following, non-exclusive respects:

- (a) Negligent and careless operation of the subject vehicle by the Defendants in violation of Miss. Code Ann. § 63-3-1213 and such conduct constitutes negligence *per se*;

- (b) Reckless, willful or wanton disregard for the safety of persons or property in violation of Miss. Code Ann. § 63-3-1201 and such conduct constitutes negligence *per se*;
- (c) Failure to keep the subject vehicle under reasonable and proper control;
- (d) Failure to keep a reasonable and proper lookout as Defendant Nixon operated the subject vehicle;
- (e) Failure to abide by the Rules of the Road;
- (f) Operating Defendants' vehicle under the influence of alcohol and/or illegal drugs;
- (g) Speeding or travelling at a speed unreasonable for the existing conditions;
- (h) Negligent hiring, training, and supervising; and/or
- (i) Other acts of omission and commission to be named in a trial of this matter.

7.

At all relevant times, herein, the Defendants were common carriers of passengers for hire who violated their obligation, under the Federal Motor Carrier Safety Regulations, to exercise the highest degree of care and diligence for the safety of its passengers including but not limited to the Plaintiff.

DAMAGES

8.

As a result of the Defendants' negligent acts and/or omissions, Chad Morehead has suffered past, present, and future pain and suffering, past, present, and future medical expenses, and past, present, and future emotional distress and mental anguish.

9.

Based on the foregoing, Plaintiff requests an award of damages for the following:

- (a) Past, present, and future medical bills;
- (b) Past, present, and future physical pain and suffering;
- (c) Past, present, and future mental and emotional distress;
- (d) Attorney's fees;
- (e) Pre-judgment interest;
- (f) Post-judgment interest;
- (g) Loss of enjoyment of life;
- (h) Punitive damages; and/or
- (i) All other damages allowed under Mississippi Law

PUNITIVE DAMAGES

Further, the Plaintiff herein would show that the acts of the Defendants were so grossly negligent, insensitive, careless, reckless, willful and wanton, and/or intentional that their conduct gives rise to punitive damages and the Plaintiff specifically request the award of such punitive damages.

WHEREFORE, PREMISES CONSIDERED, Plaintiff demands a jury trial and judgment, jointly and severally against the Defendants for all damages allowed under Mississippi law including compensatory and punitive damages in an amount to be determined by the jury, together with all costs, and for any such other general relief which the Court and jury may deem appropriate.

RESPECTFULLY SUBMITTED, this the 7th day of January, 2019.

PLAINTIFF

BY:


ROCKY WILKINS

ROCKY WILKINS, ESQ., MSB#99707
WILL GRAVES, ESQ., MSB#105679
MORGAN AND MORGAN, PLLC
4450 OLD CANTON ROAD, SUITE 200
JACKSON, MISSISSIPPI 39211
TELEPHONE: (601) 949-3388
FACSIMILE: (601) 949-3399
EMAIL: ROCKY@FORTHEPEOPLE.COM
WGRAVES@FORTHEPEOPLE.COM

COVER SHEET		Court Identification Docket #		Case Year	Docket Number
Civil Case Filing Form (To be completed by Attorney/Party Prior to Filing of Pleading)		<div style="border: 1px solid black; padding: 2px;">25</div> County #	<div style="border: 1px solid black; padding: 2px;">1</div> Judicial District	<div style="border: 1px solid black; padding: 2px;">2019</div> Court ID (CH, CI, CO)	<div style="border: 1px solid black; padding: 2px;">18</div> Docket Number
		<div style="border: 1px solid black; padding: 2px;">010719</div> Month Date Year	<div style="border: 1px solid black; padding: 2px;">18</div> Local Docket ID		
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Rev 2016)		This area to be completed by clerk	
In the CIRCUIT		Court of HINDS	County —	FIRST	Judicial District
Origin of Suit (Place an "X" in one box only)					
<input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstated <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Other <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Appeal					
Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form					
Individual <u>Morehead</u> <u>Chad</u> <u>Jr.</u> <div style="display: flex; justify-content: space-between;"> Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV </div>					
<input type="checkbox"/> Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____ <input type="checkbox"/> Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated <input type="checkbox"/> Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A _____					
Address of Plaintiff _____					
Attorney (Name & Address) <u>Rocky Wilkins, 4450 Old Canton Road, Suite 200, Jackson, MS 39211</u> MS Bar No. <u>99707</u> <input type="checkbox"/> Check (x) if Individual Filing Initial Pleading is NOT an attorney Signature of Individual Filing:					
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form					
Individual <u>Nixon</u> <u>Erika</u> _____ <div style="display: flex; justify-content: space-between;"> Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV </div>					
<input type="checkbox"/> Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____ <input type="checkbox"/> Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated <input type="checkbox"/> Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A _____					
Attorney (Name & Address) - If Known _____ MS Bar No. _____					
<input type="checkbox"/> Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet					
Nature of Suit (Place an "X" in one box only)					
Domestic Relations <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Term. of Parental Rights-Chancery <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____		Business/Commercial <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____ Probate <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Mental Health Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Alcohol/Drug Commitment (Involuntary)		<input type="checkbox"/> Alcohol/Drug Commitment (Voluntary) <input type="checkbox"/> Other _____ Children/Minors - Non-Domestic <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion <input type="checkbox"/> Minor Removal of Minority <input type="checkbox"/> Other _____ Civil Rights <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____ Contract <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____ Statutes/Rules <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	
Appeals <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Municipal Court <input type="checkbox"/> Other _____		Real Property <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____ Torts <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Intentional Tort <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input checked="" type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____			

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT, CITY OF _____

Docket No. _____ - _____ Docket No. If Filed
File Yr Chronological No. Clerk's Local ID Prior to 1/1/94 _____

**DEFENDANTS IN REFERENCED CAUSE - Page 1 of _____ Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant #2:

Individual: _____ (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business Greyhound Lines, Incorporated

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #3:

Individual: _____ (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

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D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

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D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #4:

Individual: _____ (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

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Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

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D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

CHAD MOREHEAD

PLAINTIFF

V.

CASE NO.: 19-18

**ERIKA L. NIXON, INDIVIDUALLY
AND AS AN EMPLOYEE AND
AGENT OF GREYHOUND LINES
INCORPORATED; GREYHOUND
LINES INCORPORATED; AND
JOHN DOES #1-10**

DEFENDANTS

NOTICE OF SERVICE OF DISCOVERY

Notice is hereby given, pursuant to local rules, that Plaintiff served along with this Notice in the above entitled action, the following documents to the Defendants:

1. Plaintiffs' First Set of Interrogatories to the Defendant;
2. Plaintiffs' First Set of Requests for Production of Documents to the Defendants;
and
3. Plaintiffs' First Set of Requests for Admissions to the Defendants

The undersigned retains the original of the above papers as custodian thereof pursuant to local rules.

RESPECTFULLY SUBMITTED, this the 28th day of March, 2019.

PLAINTIFFS,

BY: /s/Rocky Wilkins
ROCKY WILKINS

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